

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter13
Nicholas J. Rivelli

(DEBTORS) : Bankruptcy No. 19-11538ELF13

OBJECTION TO CERTIFICATION OF DEFAULT

Debtor objects to the Certification of Default. The Certification to a Default letter of May 21, 2020, no copy is attached and neither Debtor or Debtor's counsel reflect a receipt of said notice. Therefore, the certification is defective. The last mortgage related documents was dated 3/17/2020 advising the debtor that Shellpoint was the new servicer effective 3/1/2020.

Wherefore, Debtor seeks an order denying the Certification of Default and deny the request for relief from the stay and require the mortgagee to properly issue a default letter as required and, in the form, set forth within the court approved stipulation.

Respectfully submitted,

DATE: August 28, 2020

/s/
MICHAEL A. CATALDO
CIBIK & CATALDO, P.C.
1500 WALNUT STREET, STE. 900
PHILADELPHIA, PA 19102
(215) 735-1060